
Subject: Policy on Social Security Numbers

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1. Purpose

Virginia Tech is committed to ensuring the proper handling of the personal, confidential information that it collects in order to carry out its missions, including the *Social Security number* and the Individual Taxpayer Identification Number (collectively abbreviated as “SSN”). The purpose of this policy is to ensure that university employees and offices comply with laws and regulations that affect the use of SSNs, including the Family Educational Rights and Privacy Act, the Privacy Act of 1974, the Gramm-Leach-Bliley Act, and Virginia’s “Disclosure or display of social security number” (Code of Virginia § 2.2-3808).

Objectives of this policy and its dissemination include:

1. Awareness of the confidential nature of the SSN;
2. Minimized reliance upon the SSN for identification purposes;
3. A consistent policy regarding SSNs throughout the university; and
4. Increased confidence by students and employees that SSNs are handled in a confidential manner.

2. Policy

Virginia Tech’s policy for handling SSNs includes the following:

- to collect SSNs when legally required or legally permitted and necessary to conduct university business;
- to access SSNs to perform the necessary transactions relevant to those legal requirements or business needs, including verifying data quality and safeguarding the data;
- to maintain SSNs securely;
- and to disclose SSNs only when legally permitted.

2.1 Data Administration

Approval of the collection and use of SSNs resides with the Vice President for Budget and Financial Management. Data trustees should forward a written request for approval to the Vice President for Budget and Financial Management stating the legal requirement or business need for the data. Data trustees are defined for the SSN as those Vice Presidents and Vice Provosts (VPs) who have oversight responsibilities for offices and functions that collect and/or report the SSN, and the Vice President for Information Technology, who has oversight responsibilities for the storage of the SSN in enterprise databases.

The data stewards are the managers of the operational departments where processes require the university to collect, store, and use the SSN.

Only employees of Virginia Tech who have a need to know the SSN may have access to it. It is *limited access* information.

2.2 Collection and Storage of the Social Security Number

Mandatory collection of SSNs will only be for purposes where the collection is mandated by a United States federal government agency or by the Commonwealth of Virginia.

Once collected, an individual's SSN will be stored only in locations needed to conduct business and protect the data. SSNs will be accessed only to conduct university business.

All university forms and documents that are used to collect SSNs will employ the language included in [Section 3](#) of this policy

Forms and documents may request voluntary disclosure at early stages of a process when the SSN is likely to be required of the individual at a later point in the process (for example, application for admission or employment), as a convenient moment for the collection. These forms and documents must indicate that the request is voluntary at this stage, but may be required at a later stage in the process.

The SSN is assigned by the United States government and is subject to corrections brought to the attention of the university either by the federal government or by the individual to whom it is assigned. Virginia Tech may also undertake actions to verify SSNs.

2.3 Use of Collected Social Security Numbers

2.3.1 Use as Identifiers

SSNs will not be used either as identifiers of individuals nor as keys to records pertaining to individuals within databases. Virginia Tech employees, students, and other individuals that require a unique identifier will be assigned an identifying character string, called the *Virginia Tech ID number* (VT ID number). The VT ID number will not be the same as, nor derived from, the SSN.

2.3.1.1 Data Administration for VT ID Numbers

Data administration for VT ID numbers resides with the VPs responsible for the collection, storage, use and generation of the VT ID numbers (data trustees), and with the operational managers (data stewards). The VT ID number may be freely used within the university for business purposes (university internal use). Data trustees or designated data stewards must approve the request before ID numbers are released outside of the university.

The Virginia Tech ID number is the property of Virginia Tech and is assigned to individuals without regard for individual preferences. The university reserves the right to assign, change, or revoke the identifier.

2.3.2 Requests at Points of Service for Social Security Numbers

For situations in which Social Security numbers must be collected, different forms or levels of initial collection and verification may be required. For example, employment may require producing the Social Security card and/or verification of the number with the Social Security Administration, while compliance with the Taxpayer Relief Act permits reporting of the SSN by the individual student. Individuals may volunteer their SSN if they wish as an alternate means of locating a record.

2.3.3 Display and Dissemination of Social Security Numbers

SSNs may be released by the university to entities outside the university when:

- The SSN is required in order to comply with government reporting and transactional mandates, or otherwise required by law; or
- The external entity is acting as the university's contractor or agent.

When SSNs are released to external entities acting as contractor or agent of the university, the appropriate data steward is responsible to obtain satisfactory assurances that the information is held securely and is not re-distributed.

Particular care must be taken with older records to prevent inadvertent, inappropriate release of SSNs.

SSNs—in whole or in part—must never be placed within public view.

2.4 Security of the Social Security Number

Electronic transmission of SSNs must follow established electronic transmission security standards (see Section 2.4.1 below).

When paper documents containing the SSN are sent through a delivery system (i.e., campus mail, U.S. Postal Service, messenger services), the documents must be appropriately safeguarded.

Records containing SSNs that predate this policy need not be changed; however, these and all records that contain SSNs must be stored securely using standard encryption techniques and/or through physical security.

Data stewards and all data users of the SSN are responsible for ensuring proper and secure disposition of both paper and electronic documents or files containing SSNs in accordance with applicable University policy. University records must be handled in accordance with University Policy 2000—Management of University Records.

2.4.1 Security Standards

Information Technology maintains standards to address the handling of SSNs within electronic systems. Adherence to these standards is required. The standards address:

- Display of SSNs on computer terminals, screens, and reports;
- Security protocol required to access SSNs in electronic databases;
- Electronic storage of SSNs;
- Electronic transmission of SSNs;
- Alternate mechanisms for integrating data other than the use of the SSN; and
- Obtaining permission to include the SSN in any electronic system.

Records Management maintains standards to address the handling of SSNs in paper documents, and the disposal of SSNs in any format. Adherence to these standards is required. The standards address:

- Secure storage of SSNs;
- Appropriate methods and documentation required for disposal of paper or electronic documents containing SSNs.

3. Approved Language

University forms and documents that collect SSNs will use the language included below. Should circumstances arise in which the following statements are not appropriate, the data administrators (data trustee or data steward) will work with General Counsel to provide an appropriate alternative statement.

Student forms: “Furnishing a Social Security number (SSN) is voluntary and not required for enrollment. However, Virginia Tech is required by federal law to report to the Internal Revenue Service (IRS) the SSN of tuition-paying students. The university’s Office of Scholarships and Financial Aid also has requirements for SSN reporting. Failure to provide the SSN may delay or prevent your enrollment. The university may disclose your Social Security number when required by law, or to external entities acting as the university’s contractor or agent.”

Employee forms: “Virginia Tech is required by federal law to report income along with Social Security numbers (SSNs) for all employees to whom compensation is paid. The university may disclose your Social Security number when required by law, or to external entities acting as the university’s contractor or agent.”

General statement for student handbooks, course timetables, and related materials: “Virginia Tech is committed to protecting the privacy of its students, employees, alumni, and other associated individuals. At times, the university will ask you for your Social Security number. Federal and state law requires the collection of your Social Security number for certain purposes such as those relating to employment, taxes, and student aid.

The university may make the request for your Social Security number at a time when it is easiest for you to provide it, even if the need is not yet mandatory. For example, the university is required by the IRS to supply the name, address, and Social Security number of every tuition-paying student. The university is also required to have a valid Social Security number before an individual can receive compensation. Thus, without your Social Security number, the university cannot grant an assistantship or provide other employment. Virginia Tech may ask for your Social Security number in anticipation of need, such as at application for admission or application for employment.

The university may disclose your Social Security number when required by law, or to external entities acting as the university’s contractor or agent.

This statement was created for informational purposes only and may be amended or altered at any time.”

4. Definitions

Data administration. Policy 7100 (<http://www.policies.vt.edu/7100.pdf>) sets forth responsibilities for data trustees and data stewards, and describes more fully the use of data elements’ level of confidentiality (limited access; university internal use). Data stewards are university directors who oversee data management functions related to the capture, maintenance, and dissemination of data for a particular operational area. Data Stewards generally report to a Data Trustee. Data trustees are senior university officials who have planning and policy-level responsibilities for university data and who assign accountability for data management.

Point of service—a physical or electronic interaction between the university and its employees, students or other individuals, during which the university provides physical, educational, informational, or electronic services to the individual.

Limited access—classification of data that requires individual authorization prior to access. In the case of SSNs, access is granted on a need basis.

SSN—primarily refers to the Social Security number assigned by the Social Security Administration, and also to the Individual Taxpayer Identification number assigned by the Internal Revenue Service to individuals. SSN excludes other government-issued identifiers, whether to individuals or corporate entities.

Virginia Tech ID number (VT ID number)—alphanumeric string that uniquely associates various records with an individual within the university administrative information system.

5. References

Policy 2000: Management of University Records

<http://www.policies.vt.edu/2000.pdf>

Policy 7100: Administrative Data Management and Access Policy

<http://www.policies.vt.edu/7100.pdf>

Code of Virginia § 2.2-3808

<http://leg1.state.va.us/cgi-bin/legp504.exe?000+cod+2.2-3808>

Set-Off-Debt Collection Act: Code of Virginia § 58.1-521

<http://leg1.state.va.us/cgi-bin/legp504.exe?000+cod+58.1-521>

Privacy Act of 1974 (US Code)

6. Approval and Revisions

APPROVED:

Approved May 25, 2007 by the Executive Vice President and Chief Operating Officer, James A. Hyatt.